

Venkat Balasubramani, OSB #180446
venkat@focallaw.com
Stacia N. Lay, WSBA #30594 (*Pro Hac Vice*)
stacia@focallaw.com
Kimberlee Gunning, WSBA #35366 (*Pro Hac Vice*)
kim@focallaw.com

FOCAL PLLC

900 1st Avenue S., Suite 201
Seattle, Washington 98134
Telephone: (206) 529-4827

Clifford S. Davidson, OSB #125378
csdavidson@swlaw.com

SNELL & WILMER, LLP

1455 SW Broadway, Suite 1750
Portland, Oregon 97201
Telephone: (503) 624-6800

Attorneys for Defendant

UNITED STATES DISTRICT COURT
DISTRICT OF OREGON
PORTLAND DIVISION

A.M., an individual,

Case No. 3:21-cv-01674-MO

Plaintiff,

v.

**STIPULATED MOTION FOR ORDER
MODIFYING BRIEFING SCHEDULE
ON DEFENDANT'S MOTION TO
DISMISS THE SECOND AMENDED
COMPLAINT**

OMEGLE.COM LLC,

Defendant.

STIPULATED MOTION RE BRIEFING ON MOTION
TO DISMISS SECOND AMENDED COMPLAINT

This Stipulation is entered into between Plaintiff A.M. and Defendant Omegle.com LLC, through their undersigned counsel of record, and is based on the following facts:

1. On August 1, 2022, Plaintiff filed a Second Amended Complaint. (*See* Dkt. 43.)
2. Pursuant to FED. R. CIV. P. 15(a)(3), Omegle's response to the Second Amended Complaint is currently due August 15, 2022. Omegle intends to file a motion to dismiss Plaintiff's Second Amended Complaint pursuant to FED. R. CIV. P. 12(b)(6). Pursuant to LR 7-1(e), Plaintiff's response to the motion to dismiss would be due August 29, 2022, and Omegle's reply in support of the motion to dismiss would be due September 12, 2022.
3. The parties have met and conferred regarding the Motion to Dismiss and agreed to the following modified briefing schedule on the motion to dismiss:
 - Omegle's motion to dismiss will be filed August 22, 2022;
 - Plaintiff's response to the motion to dismiss will be filed September 12, 2022;
 - and
 - Omegle's reply in support of the motion to dismiss will be filed September 30, 2022.

SO STIPULATED AND AGREED TO BY:

Dated this 12th day of August, 2022.

FOCAL PLLC

SNELL & WILMER, LLP

By: s/ Kimberlee Gunning
s/ Stacia N. Lay
Venkat Balasubramani, OSB #180446
Stacia N. Lay, WSBA #30594 (PHV)
Kimberlee Gunning, WSBA #35366 (PHV)
900 1st Avenue S., Suite 201
Seattle, Washington 98134
Telephone: (206) 529-4827
venkat@focallaw.com
stacia@focallaw.com
kim@focallaw.com

By: s/ Clifford S. Davidson
Clifford S. Davidson, OSB #125378
1455 SW Broadway, Suite 1750
Portland, Oregon 97201
Telephone: (503) 624-6800
csdavidson@swlaw.com

Attorneys for Defendant Omegle.com LLC

VOGT & LONG PC¹

C.A. GOLDBERG PLLC

By: s/ *Barbara C. Long*

Barbara C. Long, OSB No. 122428
101 SW Main St., #1900
Portland, OR 97204
Telephone: (503) 228-9858
barb@vogtlong.com

By: s/ *Carrie Goldberg*

Carrie Goldberg (PHV)
Naomi Leeds (PHV)
16 Court Street 33rd Floor
Brooklyn, NY 11241
Telephone: (646) 666-8908
carrie@goldberglaw.com
naomi@cagoldberglaw.com

Attorneys for Plaintiff A.M.

¹ Consent for the e-signature of counsel for Plaintiff was provided via email on August 12, 2022.